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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§ Chapter 15
	§
MtGox Co., Ltd. (a/k/a MtGox KK)	§ Case No. 14-31229-sgj-15
	§
Debtor in a Foreign Proceeding	§
	§

**MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING  
ON CREDITORS GREGORY GREENE AND JOSEPH LACK'S MOTION FOR AN  
ORDER PURSUANT TO BANKRUPTCY RULE 2004 COMPELLING DEPOSITION  
TESTIMONY IN THE UNITED STATES FROM THE FOREIGN REPRESENTATIVE**

1. Gregory Greene ("Greene") and Joseph Lack ("Lack") (collectively "Movants") hereby request that a hearing to consider *Creditors Gregory Greene and Joseph Lack's Motion for an Order Pursuant to Bankruptcy Rule 2004 Compelling Deposition Testimony in the United States from the Foreign Representative* (the "2004 Motion") be set on Tuesday, April 1, 2014 at 1:30 p.m.

2. Movants filed the 2004 Motion contemporaneously with this motion. The 2004 Motion seeks an Order from this Court in accordance with Rule 2004 compelling the deposition of the debtor's Foreign Representative, Mark Karpeles, to occur in the United States, specifically in this district, at a mutually agreeable time prior to the recognition hearing or, in the alternative, an Order compelling Mr. Karpeles's deposition in accordance with Rule 7030.

3. An expedited hearing on the 2004 Motion is in the best interest of the parties. A case status conference is scheduled in these proceedings for Tuesday, April 1, 2014 at 1:30 p.m. and all parties plan to attend. Hearing the 2004 Motion during the status conference will avoid the need for a subsequent hearing on the 2004 Motion.

4. Notice of the proposed expedited hearing will be sufficient because all interested parties will be served with the 2004 Motion and this request for expedited consideration via electronic mail or first class mail, and once a hearing on the 2004 Motion has been set, Movants shall serve notice of such hearing via electronic mail or overnight courier, in accordance with the Federal Rules of Bankruptcy Procedure.

5. A hearing was not requested earlier because counsel for the Parties were busily attempting to resolve the issues surrounding the production of the foreign representative through multiple meet and confers. Specifically, counsel for the Parties meet and conferred telephonically regarding the timing and location of the deposition of the foreign representative on March 14, 2014, March 18, 2014, and March 21, 2014. Despite these teleconferences, counsel for the Parties were unable to reach an agreement regarding the location of the examination. Specifically, whereas the Plaintiffs in the *Greene* proceeding believe that the interests of U.S. creditors can only be adequately served by requiring that the deposition of the foreign representative occur in the United States, counsel for the foreign representative have offered only to produce Mr. Karpeles in Taipei, Taiwan. Furthermore, the recognition hearing is presently set for May 6, 2014 and the Movants' response to the Chapter 15 petition is due at the end of April. As such, providing the standard period of notice for motions under such circumstances would leave little time, if any, to actually conduct the examination prior to the hearing.

Dated: March 25, 2014

By: /s/ Robin E. Phelan

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**ATTORNEYS FOR GREGORY GREENE AND  
JOSEPH LACK**

**CERTIFICATE OF CONFERENCE**

Movants' counsel reached out to counsel for the Debtor with respect to this motion to expedite and the Debtor has agreed to have this heard on an expedited basis at the status conference on April 1, 2014.

By: /s/ Robin E. Phelan

Robin E. Phelan

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 25, 2014 a true and correct copy of the foregoing document was served (i) upon all parties on the attached Service List via e-mail (if available as indicated thereon) or first class mail, and (ii) via e-mail upon the parties that receive electronic notice in this case pursuant to the Court's ECF filing system:

/s/ Robin E. Phelan

Robin E. Phelan

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The Honorable Jeh Johnson  
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